

PATIENT CENTERED MEDICAL HOME – FACILITY IMPROVEMENT (PCMH-FI) GRANTS

Frequently Asked Questions

The following questions and answers are organized by the following headings/topics for the awards made under the Patient Centered Medical Home – Facility Improvement Program (PCMH-FI). The PCMH-FI funding opportunity (HRSA-14-073) is available at <http://www.hrsa.gov/grants/apply/assistance/pfi/>.

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GENERAL

1. What is the purpose of the PCMH-FI grant award?

PCMH-FI grant funding is intended to address PCMH-related capital needs at an existing Health Center Program grantee facility (i.e., an active service delivery site listed within the health center's Form 5B) for the following project types:

- Alteration and Renovation
- Construction

Funds are to be used to support allowable costs related to the purposes identified in the application.

2. Who is my Grants Management Specialist (GMS)? When should I contact the GMS?

Your GMS is listed in EHB under the HRSA Contacts section for the C8C award. Contact your GMS for assistance with questions about budget documentation, your annual Federal Financial Report (FFR), lease documentation, landlord letters of consent, property documentation, Project Director changes, contracts/agreements, and Notices of Federal Interest.

3. Who is my PCMH-FI Project Officer (PO)? When should I contact the PO? Your PCMH-FI PO is listed in the EHB under the HRSA Contacts section for the C8C award. Contact this PO for assistance with questions about environmental and historic preservation requirements, floor plans/site plans, project scope, budget documentation, award reporting requirements (e.g., construction contract, bonding, quarterly reporting,) and equipment PO's for other grants, including your H80 PO are not responsible for this award and cannot authorize actions for it.

TERMS AND CONDITIONS

4. We incurred costs prior to receiving the C8C award. Can we draw down funds for these pre-award costs?

Allowable pre-award costs are limited to pre-construction costs incurred 90 days prior to the award date. For approval of pre-award costs, a Prior Approval - Other request must be submitted through EHB.

Approval will be based on the nature of the cost, relevance of the cost to the project, and justification for the cost being incurred prior to the award date. Include a thorough description of the costs, invoices, and any other relevant documentation in the prior approval request. If approved, you will be notified through a revised NoA.

5. Can the PCMH-FI project be started while we still have conditions on our award?

Allowable costs prior to meeting all conditions of award are limited to pre-construction costs, such as completing architectural and engineering plans, meeting licensing and permitting requirements, historic preservation consultation with State Historic Preservation office (SHPO)/Tribal Historic Preservation Office (THPO), and preparing the environmental assessment.

Grantees are not authorized to start any physical construction (such as site work, grading, and demolition) until all award conditions have been met and lifted from the grant through a revised NoA. Initiating construction without meeting all conditions of award and receiving associated documentation through a revised NoA may result in a draw down restriction being placed on your Payment Management System account, reclaiming of funds, or termination of award.

6. How do we change the Project Director on the PCMH-FI grant?

To request a change of Project Director, submit a Prior Approval – Project Director (PD) Change request through EHB. The Authorized Representative must submit the request and include the grantee organizational name, the C8C grant number, a brief explanation of the change, and the resume/CV for the proposed Project Director. If approved, you will be notified through a NoA.

7. Can we change our original PCMH-FI project?

Please consult with your PO to discuss any proposed changes to the funded project. The PCMH-FI program grant awards were based on a competitive review process. Requests to revise PCMH-FI projects must align with the eligibility requirements and objectives of the funding opportunity and will likely require formal review and prior approval through EHB.

BUDGET AND SCOPE OF WORK

8. When do we need to seek prior approval for changes to the scope of project or budget?

Any major change to a budget and/or any significant changes to the scope of work require prior approval. Major changes include but are not limited to:

- Significant changes in the approved project budget, including a significant increase or decrease to the total project cost, as well as significant changes to each budget line item
- Changes to the approved physical project scope (e.g., change in the square footage affected, change in the orientation of the modified physical space)
- Changes to the Project Director
- Extensions to the project period

Please review your NoA for specific prior approval requirements, and consult with your PO to determine the most appropriate type of prior approval under which to submit the request through the EHB. If approved, you will be notified through a revised NoA. Approval of the request may be conditioned by new award terms and conditions that must be met and lifted from the NoA prior to implementing work. Initiating changes to the scope of work without receiving proper prior approval may result in the grant being placed on drawdown restriction and/or disallowed costs.

9. Is it possible to reallocate equipment by swapping/trading one piece of equipment we planned in our PCMH-FI application to purchase another?

Grantees should consult with the C8C PO to determine if the proposed equipment changes will require a prior approval request.

10. What costs are ineligible when using the PCMH-FI funding?

The following costs are not eligible when using the PCMH-FI funding:

- All costs incurred before 90 days prior to the award date
- All physical construction costs incurred prior to the award date
- Costs that do not meet federal procurement guidelines, as listed in 45 CFR 74.40 – 74.48 or Part 92
- Land and building purchases or lease payments
- Operating costs (e.g., funding direct health care services, clinical full-time equivalents, rent, mortgage payments)
- Permanent relocation costs
- Expenditures for personnel unrelated to the project
- Mobile vans
- EHR ongoing operations and maintenance
- Abatement of site and building hazardous material
- Disposable office, medical, or educational supplies

DRAWDOWN OF FUNDS

11. How soon can we begin to draw down our funds?

Grantees may draw down funds for pre-construction costs, such as completing architectural and engineering plans, meeting licensing and permitting requirements, historic preservation consultation with SHPO/THPO, and preparing the environmental assessment upon receiving the award. Funds associated with construction activities may not be drawn down until all award conditions have been met and lifted from the NoA.

Because the initiation of construction activities is contingent upon meeting all of the conditions of award, grantees should exercise caution before committing to a construction start date prior to completion of HRSA's approval and lifting of all conditions.

FEDERAL INTEREST

12. What is a Notice of Federal Interest (NFI)?

Federal interest is the federal government's share in a property, based on the federal funding that went towards acquiring or upgrading it. The federal government has a federal interest in equipment, supplies, and real property (land and buildings). A detailed description of when and why a NFI would be required for your grant can be found here <http://bphc.hrsa.gov/policiesregulations/capital/nfifilingguide.pdf>.

13. Where do I file and record my NFI?

The NFI must be filed against the property deed within your local jurisdiction. Property deeds are usually located at the County Courthouse, County Clerks, Register of Deeds, or other equivalent recordation offices. Some counties and offices may not be familiar with the NFI process, so grantees may need to explain that a NFI is essentially a Federal lien. Because the process and locations to file property-related records varies greatly between jurisdictions, HRSA is unable to provide detailed information as to how the process works within each locality. More information on how to file the NFI is available at: <http://bphc.hrsa.gov/policiesregulations/capital/nfifilingguide.pdf>.

HRSA requires a copy of a filed NFI to lift the condition from the NoA. The NFI must be notarized and recorded in the lands records office or Municipal records office before a copy is upload into the EHB, please consult with your Grants Management Specialist at HRSA if you have any questions.

14. If there is already a HRSA NFI on the same piece of property where the construction activities will occur, is the owner required to file another?

If there is an existing HRSA NFI on the same piece of property, the NFI must be amended with the additional information related to the PCMH-FI award (i.e., grant number, purpose). The amended NFI must be recorded with the appropriate jurisdictional records. A copy of the notarized and recorded amended NFI must be provided to the Grants Management Specialist via EHB. Grantees must also remember that NFIs must be filed and the conditions approved and lifted from the NoA prior to starting the construction or alteration/renovation project.

ENVIRONMENTAL REVIEWS

15. Why does HRSA have to perform an environmental review of my project?

The National Environmental Policy Act (NEPA) establishes federal environmental policy and goals for the protection, maintenance, and enhancement of the environment and it provides a process for implementing these goals within the federal agencies. Federal-wide regulations for NEPA are found at 40 CFR Part 1500. HRSA's procedures (approved by the White House Council on Environmental Quality) can be found at HHS Grants Administration Manual (GAM) Part 30 (<http://home.ncifcrf.gov/ehs/uploadedFiles/DHHSGam30.pdf>).

16. Would an environmental assessment that was done in 2009 on the facility within which we are proposing to remodel interior space for use as a health center? Is the draft environmental assessment project-specific?

Some grantees received a condition on their award that a draft environmental assessment (EA) is required or that they must consult with their Project Officer to determine if one is required. If an EA is required, the draft EA must be specific to the proposed PCMH-FI project. However, general information from the previous EA could serve as a base and provide much of the information that is required in the draft EA for HRSA.

Additional technical assistance on the requirements of the draft EA can be found at <http://bphc.hrsa.gov/policiesregulations/capital/environmentandhistoric/capitaldevelopment.html>.

17. One of the PCMH-FI grant conditions for our project requires us to submit a draft EA within 90 days of the award issue date, but we do not think we will be able to meet this deadline. What should we do?

Grantees should submit the draft EA, if required, as soon as possible. If you are not able to meet the deadline, submit an extension request in the EHB and provide an explanation for why the extension is necessary. Grantees may not begin their project until all conditions of award have been met and lifted in a NoA.

CULTURAL RESOURCE ASSESSMENT AND HISTORIC PRESERVATION

18. Is consultation with the State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO) required for our project?

Grantees should contact their State Historic Preservation Office (SHPO) and/or Tribal Historic Preservation Office (THPO) to identify the funded project and request NHPA Section 106 consultation, if applicable. The SHPO/THPO will provide a response that either:

- Requests additional information;

- Requests a draft Memorandum of Agreement (MOA) between the SHPO/THPO, grantee and HRSA detailing a plan to reduce the adverse effects. Upon approval by HRSA, it will be signed by all parties; or
- Determines the project will have no adverse impact.

Additional technical assistance on historic preservation review and compliance can be found at <http://bphc.hrsa.gov/policiesregulations/capital/environmentandhistoric/capitaldevelopment.html>.

ADMINISTRATIVE AND POLICY REQUIREMENTS

19. Where can I find more information about procurement issues?

Information regarding HHS regulations 45 CFR Parts 74 and 92 and other procurement issues is available at <http://bphc.hrsa.gov/policiesregulations/capital/postaward/fagprocurement.pdf>. This resource addresses issues such as avoiding conflicts of interest, contracts pre-existing the grant award, simplified acquisition, and competitive bidding. It is critical that proper procurement procedures are implemented in order to have a successful project.

20. What documentation is required by HRSA if our organization does some work on our funded project using our own facilities management staff ("force account labor")?

HRSA needs the information outlined at <http://bphc.hrsa.gov/policiesregulations/forcefaq.pdf> for "force account labor" requests. The grantee should contact the PO to discuss the appropriate way to submit the "force account labor" documentation into the EHB.

REPORTING

21. What are the reporting requirements listed in my NOA?

The Reporting Requirements section of the NOA lists specific deliverables required of all PCMH-FI projects. These requirements allow HRSA to monitor and ensure that projects are progressing as they were proposed in the PCMH-FI application. The reporting requirements include the following:

- Quarterly Progress Report
- Project Implementation Certification
- Certification of Final Design
- Construction Contract and Supporting Documents
- Bonding Coverage Certification
- Annual Financial Report

In addition, close-out reporting requirements submitted after the project has been fully completed include the following:

- Project Completion Certification
- Photographs
- Final Budget Information

22. When is my first quarterly progress report (QPR) due?

The first QPR will be due in January 2015 and will cover the reporting period from the award date through December 31, 2014.

23. How will I know what to report in the QPR?

Specific instructions will be provided in the Capital Grant QPR Reporting Manual. The manual is available at <http://www.bphc.hrsa.gov/policiesregulations/capital/qprmanual.pdf>.

24. What should I do if I miss the deadline?

If you miss submitting your QPR, please follow up with your Project Officer immediately. Failure to submit your capital grant QPR could result in HRSA actions on your grant award, such as a draw down restriction being placed on your Payment Management System account, reclaiming of funds, or termination of award. Information regarding the QPR is available at <http://bphc.hrsa.gov/policiesregulations/capital/>.